

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Sep 12, 2024

SEAN F. McAVOY, CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

TAHVIO GRATTON, an individual,

Plaintiff,

v.

UNITED PARCEL SERVICE, INC.,
an Ohio Corporation,

Defendant.

CASE NO: 1:22-CV-3149-TOR

VERDICT FORM

Question No. 1: Has Plaintiff proved retaliation in violation of 42 U.S.C. § 1981
by a preponderance of the evidence?

Answer to Question No. 1: Yes ☒ No ☐

Question No. 2: Has Plaintiff proved retaliation in violation of the Washington
Law Against Discrimination by a preponderance of the evidence?

Answer to Question No. 2: Yes ☒ No ☐

Question No. 3: Has Plaintiff proved Wrongful Discharge in violation of Public
Policy by a preponderance of the evidence?

Answer to Question No. 3: Yes ☒ No ☐

Question No. 4: If you answered YES to Question No. 1, No. 2 and/or No. 3, what sum of money do you find from a preponderance of the evidence to be the total amount of the Plaintiffs' damages for emotional distress, loss of enjoyment of life, humiliation, pain and suffering, personal indignity, embarrassment, fear, anxiety, and/or anguish experienced and with reasonable probability to be experienced by the Plaintiff in the future?

\$ 39.6 million

If you found that the plaintiff has failed to prove damages as defined in these instructions, you must award nominal damages. Nominal damages may not exceed one dollar. \$ _____

Question No. 5: If you answered Question No. 1 as Yes, did Plaintiff prove that Defendant's conduct was "malicious, oppressive or in reckless disregard of the Plaintiff's rights."

Answer to Question No. 5: Yes ☒ No ☐

If you answered this Question as Yes, what are the punitive damages that Defendant should pay to Plaintiff. Punitive damages may not be awarded to compensate a Plaintiff. \$ 198 million

PRESIDING JUROR 

DATED: 9/12/2024